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October 9, 2003

The Honorable Richard Bennett
United States District Court
For the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

Re: Jeffrey Lawrence v. The Imagine Yacht, L.L.C.
Case No. MJG-02-3224-Discovery Status Report

Dear Judge Bennett:

Pursuant to this Court's Scheduling Order of April 3, 2003, as amended on June 25, 2003, please accept this document as a joint discovery status report.

Despite the best efforts of the parties discovery has not yet been completed. Written discovery has been completed and depositions of the main fact witnesses have taken place but Plaintiff wishes to conduct the deposition of the President of Latitude 38, L.L.C., who was unavailable earlier. Defendant's counsel also wishes to conduct the depositions of the member's of Mr. Lawrence's law firm, Sher & Blackwell, L.L.P., who were on board the vessel at the time of the incident. The number of attorneys involved in this action, including the Plaintiff himself, has complicated the scheduling of depositions. The parties are also scheduling a site visit aboard the subject vessel during which sound experts for both sides will take sound readings. After the experts have completed their reports, the parties will still need to depose their opponent's experts.

Therefore, we would request a ninety-day extension to complete discovery. The parties are amicably working together to complete all discovery by then.

The parties have seriously discussed settlement, most recently on October 8, 2003, however they have been unable to reach any resolution at

this time. The additional depositions and site visit will assist the parties in determining their respective positions.

Very truly yours,
RESNICK & ABRAHAM, L.L.C

A handwritten signature in black ink, appearing to read 'Prabir', followed by a long horizontal flourish.

Prabir Chakrabarty
MD25524

cc: Robert Boyce, Anderson, Coe & King, LLP
David Skeen, Wright Constable & Skeen
Eric Stravitz, Meyrowitz & Stravitz, P.L.L.C.